IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

RONALD A. KATZ TECHNOLOGY LICENSING, L.P.)
Plaintiff,)
) C.A. No. 06-547 (GMS)
v.)
) Jury Trial Demanded
AMERICAN INTERNATIONAL GROUP,)
INC., et al.)
)
Defendants.)

WILMINGTON TRUST COMPANY AND WILMINGTON BROKERAGE SERVICES COMPANY'S JOINDER IN AQUILA, INC.'S REPLY IN SUPPORT OF ITS MOTION TO STAY ACTION

Defendants Wilmington Trust Company and Wilmington Brokerage Services Company (collectively "Wilmington Trust") hereby join in the Reply Brief in Support of the Motion to Stay filed by defendant Aquila, Inc. ("Aquila") on January 29, 2007. For the reasons cited in Aquila's Reply Brief In Support of Its Motion to Stay Action, the Motion to Stay and the attached exhibits, Wilmington Trust respectfully requests that the Court stay this action in its entirety pending the completion of all reexamination proceedings by the United States Patent and Trademark Office involving plaintiff's United States patents that have been asserted in this action as well as other related, but unasserted patents. Specifically, this Court should stay this action in its entirety because: (1) plaintiff will not be prejudiced, much less unduly prejudiced by such a stay; (2) such a stay will simplify the proceedings as a result of the findings of the reexamination proceedings, and thus conserve this Court's and the parties' resources relating to the investigation, discovery, analysis, and construction related to patent claims which are likely

to be amended or even cancelled during reexamination; and (3) this action has not progressed past the initial pleading stage, discovery has not yet begun, and no trial date has been set.

Dated: February 7, 2007

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CERTIFICATE OF SERVICE

I, David A. Felice, do hereby certify that on February 7, 2007, I electronically filed the foregoing with the Clerk of Court using CM/ECF, which will send notification of such filing to the following counsel of record:

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